

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS DAVID E. WILLIAMS  
(APWU/USPS-T1-5-7)  
(December 29, 2011)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness David E. Williams (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-5 On page 5 of your testimony you state that the “objective of the modeling exercise was to determine whether excess capacity could be reduced significantly within the network if service obligations and operating constraints driven by current overnight First-Class Mail service standards were changed.”

- a) Did the Postal Service consider any other objectives in lieu of changing the current overnight service standards for First-Class Mail as a means of reducing excess capacity?
- b) If so, please identify alternative objectives and explain why those alternatives were not chosen.
- c) If not, please explain why the Postal Service did not examine possible alternatives that would preserve overnight First-Class Mail service standards.

APWU/USPS-T1-6 Page 7 of your testimony references a “cross-functional Headquarters team.” Please identify by name, title and years of service in that position, each member of the cross-functional team.

APWU/USPS-T1-7 Please define “associated customer service facilities” as used in Footnote 8 on page 10 of your testimony.